

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

Joseph P. Maher
Juli' A. D'Ancona-Maher

(b) County of Residence of First Listed Plaintiff Lehigh
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Joseph P. Maher, Esq.,
3225 Alton Street, Allentown PA 18103 484.264.8005

DEFENDANTS

Officer Jeffrey Renninger
Chief of Police Allen W. Stiles
---- Please see continuation sheet

County of Residence of First Listed Defendant
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE
LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | PTF | DEF | PTF | DEF |
|---|---|---|-----|
| Citizen of This State | <input type="checkbox"/> 1 <input type="checkbox"/> 1 Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 <input type="checkbox"/> 4 | |
| Citizen of Another State | <input type="checkbox"/> 2 <input type="checkbox"/> 2 Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 <input type="checkbox"/> 5 | |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 <input type="checkbox"/> 3 Foreign Nation | <input type="checkbox"/> 6 <input type="checkbox"/> 6 | |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input checked="" type="checkbox"/> 440 Other Civil Rights	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 U.S.C. §1983

Brief description of cause:

Civil Rights - police misconduct with pendent state claims

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 **DEMAND \$** > \$150,000

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

7/19/07

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

Case 2:07-cv-02979-JS Document 1 Filed 07/19/07 Page 2 of 33
INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

I. (a) Plaintiffs-Defendants. Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

II. Jurisdiction. The basis of jurisdiction is set forth under Rule 8(a), F.R.C.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.

United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.

United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.

Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.

Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; federal question actions take precedence over diversity cases.)

III. Residence (citizenship) of Principal Parties. This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

IV. Nature of Suit. Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerks in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.

V. Origin. Place an "X" in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.

Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.

Appeal to District Judge from Magistrate Judgment. (7) Check this box for an appeal from a magistrate judge's decision.

VI. Cause of Action. Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.**

Example: U.S. Civil Statute: 47 USC 553
 Brief Description: Unauthorized reception of cable service

VII. Requested in Complaint. Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.

Demand. In this space enter the dollar amount (in thousands of dollars) being demanded or indicate other demand such as a preliminary injunction.

Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

VIII. Related Cases. This section of the JS 44 is used to reference related pending cases if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

CIVIL COVER SHEET CONTINUATION - Maher v. Renninger, et al.

Additional Defendants:

The Township of Salisbury

The Honorable Karen C. Devine

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 3225 Alton Street, Allentown PA 18103

Address of Defendant: 3000 S. Pike Avenue, Allentown PA 18103

Place of Accident, Incident or Transaction: Salisbury Township, Pennsylvania

(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes ☐ No ☒

Does this case involve multidistrict litigation possibilities?

Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: _____ Judge _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?

Yes ☐ No ☒

2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?

Yes ☐ No ☒

3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?

Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts

2. ☐ FEHA

3. ☐ Jones Act-Personal Injury

4. ☐ Antitrust

5. ☐ Patent

6. ☐ Labor-Management Relations

7. ☒ Civil Rights

8. ☐ Habeas Corpus

9. ☐ Securities Act(s) Cases

10. ☐ Social Security Review Cases

11. ☐ All other Federal Question Cases
(Please specify)

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts

2. ☐ Airplane Personal Injury

3. ☐ Assault, Defamation

4. ☐ Marine Personal Injury

5. ☐ Motor Vehicle Personal Injury

6. ☐ Other Personal Injury (Please specify)

7. ☐ Products Liability

8. ☐ Products Liability — Asbestos

9. ☐ All other Diversity Cases

(Please specify)

ARBITRATION CERTIFICATION

(Check appropriate Category)

I, John P. Karoly, Jr., counsel of record do hereby certify:

☒ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;

Relief other than monetary damages is sought.

DATE: 9/19/07

Joseph P. Maher
Attorney-at-Law

23693
Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 9/19/07

Joseph P. Maher
Attorney-at-Law

23693
Attorney I.D.#

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CASE MANAGEMENT TRACK DESIGNATION FORM

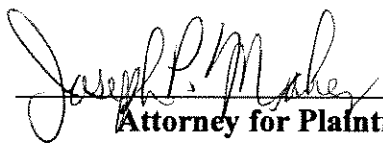
Joseph P. Maher, et ux.	:	CIVIL ACTION
	:	
v.	:	
	:	
Officer Jeffrey Renninger, et al.	:	NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a case management track designation form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. §2241 through §2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) (X)
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ()

<u>7/19/07</u>	<u>Joseph P. Maher</u>
Date	Attorney-at-law
<u>484.264.8005</u>	<u>610.791.5078</u>
Telephone	FAX Number


Attorney for Plaintiffs
<u>joemaher@fast.net--</u>
E-Mail Address

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN
DISTRICT OF PENNSYLVANIA

JOSEPH P. MAHER,
3225 Alton Street
Allentown, PA. 18103-6456

and

JULI' A. D'ANCONA-MAHER,
3225 Alton Street
Allentown, PA. 18103-6456

Plaintiffs

v.

OFFICER JEFFREY RENNINGER,
Individually and in his official capacity
as a member of the Salisbury Township
Police Department,
3000 S. Pike Avenue
Allentown, PA. 18103

No.

CHIEF OF POLICE ALLEN W. STILES,
Individually and in his official and
supervisory capacity as Chief of the
Salisbury Township Police Department,
3000 S. Pike Avenue
Allentown, PA. 18103

THE TOWNSHIP OF SALISBURY,
2900 S. Pike Avenue
Allentown, PA. 18103

and

THE HONORABLE KAREN C. DEVINE,
Individually and in her official capacity as a
Magistrate of the Commonwealth of
Pennsylvania,
506 Court Street

Allentown, PA. 18103 :
Defendants :

COMPLAINT

AND NOW COME the Plaintiffs, Joseph P. Maher and Juli' A.. D'Ancona-Maher, Husband and Wife, by and through their undersigned legal counsel of record, Joseph P. Maher, Esquire, and, by way of Complaint against the named Defendants upon a cause or causes of action, do hereby allege and aver as follows:

I. JURISDICTION AND VENUE

1. This action is instituted under the United States Constitution, particularly under the provisions of the First, Fourth, Fifth and Fourteenth Amendments, and under federal law, particularly the Civil Rights Act of 1871, hereinafter referred to as the "Act", as amended, 42 U.S.C. Sections 1983, 1985 and 1988.
2. This Court has jurisdiction in this matter pursuant to 28 U.S.C. §1331, §1343 (3), §1343 (4) and §1367, regarding the principles of pendent and supplemental jurisdiction over related state law claims.
3. Venue in the Eastern District is properly laid pursuant to 28 U.S.C. §1391, in so far as the following alleged unlawful conduct complained of in this Complaint, which forms the factual and legal basis of the Plaintiff's claims, arose within the geographical limits of this district.

II. PARTIES

4. Plaintiff, Joseph P. Maher, is an adult individual, current residing at 3225 Alton

Street, Allentown, PA. 18103-6456.

5. Plaintiff, Juli' A. D'Ancona-Maher, is an adult individual, currently residing at 3225 Alton Street, Allentown, PA. 18103-6456, and is the wife of Plaintiff, Joseph P. Maher.
6. Defendant, Officer Jeffery Renninger, (hereinafter referred to as "Renninger") is an adult individual who is currently serving in his capacity as a sworn officer with the rank of Officer in the Salisbury Township Police Department, and who is entrusted with the power to enforce laws of the Commonwealth and the Township of Salisbury. Defendant Renninger is entrusted to protect the Constitutional rights of those he encounters, and who at all times relevant hereto was acting within the scope of his duties and authority under color or title of state or municipal public law and acted in concert with one or more of the Defendants in the performance of their conduct or actions. Renninger was acting under the color of law and within the scope of his employment at all times relevant to this action or was acting independently.
7. Defendant, Chief of Police, Allen W. Stiles, is an adult individual (hereinafter referred to as "Stiles"), who is a sworn member of the Salisbury Township Police Department who is responsible for the formulation and/or implementation of practices, policies, customs, procedures, discipline, control and assignment of officers, as well as the day-to-day operation and overseeing and command and control of all segments of the Police Department, and who at all times relevant hereto was acting within the

scope of his duties and authority, under color or title of state or municipal public law or ordinance and supervised or controlled one the other individual Defendant Renninger herein his conduct or actions, or acted in concert with him in the performance of their conduct or actions or was acting independently. Defendant Stiles is the ultimate authority for the staffing, promotions and operational functions of the Salisbury Township Police Department..

8. Defendant, Township of Salisbury (hereinafter referred to as the “Township”), is a governmental entity within the Commonwealth of Pennsylvania empowered to establish, regulate and control its Police Department for enforcement of laws within its jurisdiction and for purpose of protecting and preserving the persons and property within the geographical and legal jurisdiction of the Township.
9. Defendant, The Honorable Karen C. Devine) hereinafter referred to as “Devine”) is a magisterial district judge of the Commonwealth of Pennsylvania within the present boundaries of the County of Lehigh and is entrusted with the power to enforce the laws of the Commonwealth of Pennsylvania, with the power to enforce and protect the constitutional rights of those persons she encounters, and at all times hereto was acting under her authority and color of law or acted independently. In her position as Magistrate she has the authority to conduct preliminary arraignments and imprison individuals who come before her charged with criminal offenses and to set reasonable bail for the release of said individuals.

III. FACTUAL ALLEGATIONS

10. On or about July 19, 2005, Plaintiff Joseph P. Maher (hereinafter sometimes referred to as "Mr. Maher"), was a member of the Supreme Court of Pennsylvania bar and admitted to practice law in the Commonwealth of Pennsylvania since November 1, 1976. Earlier that year in the primary held on May 17, 2005, Mr Maher had run for the position of Magistrate for District 31-1-08, which district was comprised of the Township of Salisbury and the Borough of Fountain Hill. Mr. Maher did not with the primary, but rather was defeated by the long-time incumbent, The Honorable Anthony G. Rapp, Jr. During the course of the campaign Mr. Maher had verbally and in writing touted his experience as an attorney and had expressed his view that magistrates in the Commonwealth should be attorneys rather than lay persons who simply had to pass an examination to be qualified to run.
11. At the time he was a 54-year old married individual who was in excellent health and physical condition.
12. On or about te early morning hours of Saturday, July 16, 2005, Mr. Maher and Juli A. D'Ancona-Maher (hereinafter sometimes referred as "Mrs. Maher") had a verbal discussion outside their residence located at 3225 Alton Street while Mr. Maher was situated in his motor vehicle and Mrs. Maher was standing nearby.
13. Mr. Maher at the conclusion of their discussion drove away. However, unfortunately, the remotely controlled garage door of the residence had been activated and the garage door from which Mr. Maher had existed the residence in his vehicle had closed and

Mrs. Maher found herself located outside the residence with no keys or other means to gain entrance of the otherwise locked residence. Mr. Maher had no knowledge when he drove away that Mr. Maher had been locked out of the residence.

14. Mrs. Maher had no idea when Mr. Maher would be returning that morning and felt extremely isolated and cold standing outside of the residence on the morning and took it upon herself to break into the residence by forcing the front door of the residence open and in the process breaking the door in one or more places and also scratching and otherwise bruising her neck and should in the process of forcing open said front door to gain entrance to the residence.
15. Shortly hereafter when Mrs. Maher had gained access to the residence, Officer Renninger arrived at the residence at approximately 3:00 a.m. Saturday morning, July 16, 2005, in response to a telephone call by and unidentified individual for the allege purpose of determining what if anything had been going on at the Maher residence earlier in the morning. Apparently, previously there had been one or more telephone calls to the residence by various unnamed individuals and during one or more of these telephone calls Mr. Maher had spoken to one or more individuals.
16. When Officer Renninger entered the house he proceeded to investigate the entire premises to determine if Mrs. Maher was the only individual in the residence. He did this in spite of the fact that he had already been told by Mrs. Maher that she was the only person in the residence.

17. For the next hour or so Officer Renninger remained on the Maher premises interviewing Mr. Maher and also apparently took several photographs of Mr. Maher, Particularly of her neck area which she had scratched breaking into the residence earlier in the morning. Office Renninger informed her during the course of their conversation that he was related to Magisterial District Judge Rapp. He also informed her that he might have arrested Mr. Maher if he was home believing that Mrs. Maher had suffered her injuries as a result of a domestic violence incident even though he had been informed by Mrs. Maher that her injuries had occurred when she forced her way into the locked residence.
18. Mr. Maher returned to the residence a short while after Officer Renninger left the residence. He had a lengthy conversation with Mrs. Maher as to what had occurred after he had driven away from the residence. After said conversation the couple went to bed without any further incident.
19. Northing of further relevance or importance happened until the following Tuesday evening, July 19, 2005 at approximately 7:30 p.m. The Plaintiffs were home alone watching a movie. The couple had been together all day that day celebrating Mrs. Maher's birthday which had been the day before.
20. At approximately 7:30 p.m, Officer Sabo of the Salisbury Township Police Department rang the front door bell. Mr Maher went to answer the door and was asked by Offier Sabo to exist the premises. Mrs. Maher then came to the front door when Mr.

Maher did not immediately return. Both Mr. & Mrs. Maher were informed that Officer Sabo had an arrest warrant for Mr. Maher, but upon inquiry by Mr. Maher he refused to inform him as to what charges he was being arrested. Mr. Maher was not informed of his Miranda rights but made no statements since he was not so informed as to what was going on.

21. Both Plaintiffs saw that Officer Sabo was accompanied by two other unnamed police officers, one of whom was approximately fifteen (15) feet away at a corner of the house with a drawn firearm even though no one had resisted arrest or even made any threatening comments to Officer Sabo or to either of the other two officers.
22. Mr. Maher became hysterical when she realized that Mr. Maher was being arrested. Officer Sabo was proceeding to handcuff and otherwise shackle Mr. Maher even though Mr. Maher was offering no resistance to going with the officers to be formally charged with the then unnamed alleged offenses. None of this made any sense to the Mahers since it was known in the community that Mr. Maher was a well recognized member of the Bar Association of Lehigh County wand also a former member of the Board of Commissioners of Lehigh County.
23. Mrs Maher pleaded with Officer Sabo and the other unnamed officers not to arrest her husband in that he had done nothing and they were at home watching a movie and otherwise celebrating her birthday. All of this was to no avail since the officers proceeded to finish restraining Mr. Maher and took him away to be booked and then

otherwise processed. Mr. Maher attempted to comfort his wife as best he could given his present situation. The Mahers were told by the officers upon questioning by Mr. Maher that he would eventually be taken to night court in the City of Allentown for a preliminary arraignment. Mr. Maher quickly tried to explain to his new wife (the Plaintiffs had only been married approximately a month before and Mrs. Maher was not a native of the area) as to where night court was located.

24. Subsequently, Mr. Maher was taken to the Salisbury Township Police Office and formally “booked” and given a copy of charges against him. Mr. Maher informed the officers that he did not have his reading glasses with him with which he normally reads legal documents. The officers offered not relief to Mr. Maher and in fact failed to take off his restrains so that he could hold the documents or otherwise adjust it to that he could better read it. Somehow, he managed to ascertain that he was being charged with simple assault and harassment.
25. Thereafter after spending some time in the Salisbury Township lock-up, he was taken—still handcuffed and otherwise shackled—to night Court located at 506 Law Street, City of Allentown to meet with an be preliminarily arraigned before whichever Magistrate was then presiding that evening. Mr. Maher was transported from the Salisbury Police Department to night Court in the Salisbury Township canine vehicle with the dog in the vehicle near him and the window rolled down in the vehicle on a warm July summer evening..

26. As the situations would have it, Magisterial District Judge Karen C. Devine who normally presided at that location during regular business hours was presiding over night Court that evening. Mr. Maher was taken into the courtroom and left there with numerous other arrested persons to await disposition by Magistrate Devine.
27. Approximately forty minutes after arrival at night court, or approximately 9:30 p.m. He met wit Magistrate Devine who sat across from him at a counsel table located in the office. Magistrate Devine asked Mr. Maher if he was waiving the formal reading of the charges and when he replied “Yes” she asked him how he was pleading to the charges. He informed her that he was pleading “Not Guilty?”
28. Mr. Maher then attempted to explain who he was and the fact that his wife—who had found the location of night court with the assistance of a friend of Mr. Maher—was apparently being kept out of the courtroom. In response Magistrate Devine stated” I am well aware of who you are.”
29. Mr. Maher then stated that while the Affidavit of Probable Cause was probably one of the worst he had even seen in early 30 years of practice, the major purpose of the preliminary arraignment was to set bail for the forthcoming preliminary hearing and any subsequent procedural events that might be necessary. He explained that he was probably the most recognized member of the public that had even appeared before Magistrate Devine in the approximately two plus years she had been a magistrate. In spite of the fact that she had previously stated she knew who he was, Mr. Maher told

her of facts regarding his law practice and his long-time residence in the community and that he was a former Lehigh County Commissioner.

30. Magistrate Devine then for whatever reasons she had (ignoring the prior colloquy between them) stated that she was going to set a straight cash bail of \$5,000.00, impose a no contact provision condition as to bail and remand Mr. Maher to the Lehigh County Prison overnight as a “cooling off period.” Mr. Maher then attempted to remind Magistrate Devine that the alleged incident had occurred over 3 ½ days before than this his wife, the alleged victim was not permitted in the courtroom to state that she did not want any no contact provision between them and he was not allowed to return to his residence where he had lived for most of the last eleven (11) years. Magistrate Devine stated that Mr Maher given who he was would probably be given a minimum bail or even released on his own recognizance the next morning, but she was imposing the “cooling off period” for this evening apparently believing Mr. Maher would have to spend the night in prison.
31. Mr. Maher was then taken to the Lehigh County Prison and was being processed into the main facility when he made contact with a bail bondsman his wife had contacted to bail him out of prison. Mr Maher had to spend another hour or two in a holding cell in the prison before he was bailed out. Apparently Magistrate Devine attempt do dissuade the bail bondman from bailing Mr. Maher out of prison, but when said bail bondsman persisted, she signed the paperwork releasing him from the prison at

approximately 12:45 a.m., Wednesday, July 20, 2005.

32. It took about an hour to complete the paper work with the bail bondsman. However, due to the inappropriate no contact bail provision and exclusion from his home, Mr. Maher had nowhere to go. Mrs. Maher and a female friend of the couple went to the marital home to obtain clothes and other items for Mr. Maher. Upon arrival at the marital home, Mrs. Maher discovered a Salisbury Police cruiser and two officer sitting nearby the Maher residence. As she approached the vehicle the two officers drove away.
33. During the Courts of the early morning hours of July 20, 2005, Mr. Maher prepared a Petition for Bail Modification at his then office in Palmerton. He and Mrs. Maher separately went to the Lehigh County Courthouse. Mr. Maher went to meet with either the sitting Motion's Judge or the Judge assigned to oversee either Magistrate Rap and/or Magistrate Devine. Mrs. Maher went to the District Attorney's Office to met with one or more assistant district attorneys to plead her case that Mr. Maher be permitted to return home until his preliminary hearing.
34. Mr Maher subsequently appeared before the Hon. William E. Ford wit his petition. Judge Ford recognizing why Mr Maher was before him since word of his arrest the evening before had apparently been widely disseminated, requested Mr. Maher to meet with the District Attorney's Office and/or appear before Magistrate Rapp who had executed the arrest warrant to discuss a bail modification. A short time latter the

District Attorney's Office verbally agreed that the no contact provision would be lifted pending a formal order of the Court of Common Pleas of Lehigh County.

35. At about the same time as Mr. and Mrs. Maher were in the Lehigh County Courthouse, Magistrate Rapp who had issued Mr. Maher's arrest warrant and was Mr. Maher's opponent in the recently concluded primary election, recused himself from further involvement in the case. Subsequently, the case was assigned to Magistrate Charles Crawford and at the time Mr. Maher's preliminary hearing was finally scheduled to be heard on December 8, 2005, the Commonwealth withdrew all charges.
36. It appears that the entire arrest sequence came about because Mr. Maher had taken the action of running for Magistrate in Salisbury Township against Officer Renninger's relative, Magistrate Anthony G. Rapp, Jr. and advocated during his candidacy that he was the more qualified candidate due to the fact that he was an attorney with many years of experience and his position that the public would be best served if all magistrates were required to be licensed attorneys just as judges of all the other courts in Pennsylvania are required to be so licensed.
37. The Salisbury Township Police Department has a long-standing custom, policy, practice and history of abusing its citizens for their own ends. This policy and history were shown in 1998 when one or more of the then Salisbury Police Officers falsely arrested well recognized and outstanding citizens, Charles Russoli and Maguerite Russoli, whose charges like Mr. Maher's were later dismissed. The Russoli's case with

the Township of Salisbury and its police department and several of its officers was filled in this Honorable Court a 98-cv-02688 and was ultimately settled in December 2002 while in the course of trial.

38. The action or conduct of the Defendants resulted in severe psychological injuries to the Plaintiff, Mr Maher, as more fully described hereinafter, as well as economic losses and damages to his professional reputation and his reputation in the community.
39. Plaintiff, Juli' A. D'Ancona-Maher, has suffered the loss of companionship of her husband due to his psychological injuries.

COUNT I.
VIOLATION OF 42 U.S.C. § 1983

PLAINTIFF, JOSEPH P. MAHER

v.

ALL DEFENDANTS.

40. Plaintiffs hereby incorporated by reference all the allegations contained in paragraphs 1 through 39 above as though the same had been set forth fully at length herein.
41. Prior to July 19, 2005, the Township of Salisbury developed and maintained policies and/or customs exhibiting deliberate indifference to the constitutional rights of per son in Salisbury, which caused or directly contributed to the violations Plaintiffs' rights.
42. It was th policy and/or custom of the Township of Salisbury to inadequately and improperly investigate citizen complaints of police misconduct, and acts of misconduct were instead ignored, tolerated and in some instances even rewarded by the Township

of Salisbury, including the preclusion of public access to pertinent police reports.

43. As far back as 1998, involving the aforesaid Russoli incident, and even subsequent incidents to July 19, 2005, including but not limited to a more recent incident in which police officers intimidated Mrs. Maher into filing a false Protection from Abuse complaint against Mr. Maher in October 2006 telling her that if she did not do so that she could lose her children, the Defendants have covered-up incidents from the press and the public and interested persons for the protection of the members of the police department, including the individual Defendants, the Police Department and the Township of Salisbury to avoid taking responsibility for the individual and collection actions.
44. It was the policy and/or custom of the Township of Salisbury to inadequately supervise and train its police officers, including, the Defendant officer, thereby failing to adequately discourage and prevent further constitutional violations on the part of its police officers. The Township did not require appropriate in-service training or re-training of officers who were known to have engaged in police misconduct.
45. As a direct and proximate result of the above described policies and customs, police officers of The Township of Salisbury, including the individual Defendant officer, believe that his improper and unlawful actions would not be properly monitored by supervisory officers and that misconduct would not be investigated or sanctioned, but instead would be tolerated and cover-up.

46. The above-described policies and custom demonstrate a deliberate indifference on the part of policy makers of the Township of Salisbury to the constitutional rights of citizens and person within the Township, including the Plaintiffs, and were the cause of the violations of Plaintiff's rights alleged herein and hereinafter.
47. The Defendants alleged conspiratorial actions included but are not limited to the following actions:
 - a. Concealing from the public the identity of the perpetrator;
 - b. Refusing to disclose the complete accident/incident report;
 - c. Failing to discipline or retrain Defendant Renninger following the dismissal of all charges; and
 - d. Failing to discipline or retrain superior officers, including the Defendant for their failure to discipline or retrain subordinates who engaged in misconduct while on duty.
48. The conspiratorial actions of Defendants in conjunction with the false charges and malicious prosecution constitute and provide Plaintiffs with a cause of actions for the violation of their constitutional rights.
49. Following the filing of charges and the subsequent dismissal, the Defendants engaged in a course of conduct calculated to limit the Defendants' liability for the bring of false charges against Mr. Maher and further calculated to deprive Mr. Maher of his federally protected due process right to access to the courts, to fairly investigate and litigate the

underlying misconduct of Defendant Regginger.

50. Cover-ups such as in this case and the failure to take appropriate actions have occurred with this department with such sufficient frequency that behavior of the individual Defendant has become a part of the Township of Salisbury's policy or custom.
51. Such conduct also demonstrates that supervisory liability exists because any officer and especially a supervisory officer who, as herein, has acknowledged said unlawful and/or tortuous activity ratifies that activity by either failing to take appropriate corrective actions or has by his activity of covering up the underlying conduct become himself liable for the conduct.
52. As a direct an approximate result of the aforesaid conduct and actions of the Defendants the Plaintiff has suffered the following injuries, damages and losses:
 - a. emotional and psychological distress and trauma;
 - b. mental anguish;
 - c. psychic pain and suffering;
 - d. severe fright, horror and grief;
 - e. shame, humiliation and embarrassment;
 - f. severe anger, chagrin, disappointment and worry;
 - g. the need to expend funds for medical care and treatment; and
 - h. justified punitive damages, both factually and legally because of the outlandish and outrageous conduct, actions and omissions of one

or more of the Defendants.

WHEREFORE, Plaintiff respectfully request that this Honorable Court award judgment against the Defendants, jointly and severally, in an amount in excess of the One Hundred Fifty Thousand (\$150,000.00) Dollars limit for adjudication in this jurisdiction.

COUNT II
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

PLAINTIFF JOSEPH P. MAHER

v.

ALL DEFENDANTS

53. Plaintiff hereby incorporates by reference all the allegations contained in paragraphs 1 through 52 above as though the same had been set forth fully at length herein.
54. The aforesaid extreme and outrageous conduct, acts or omissions of the Defendants in the scope of their employment, or acting independently, were calculated, designed and intended by the Defendants to intentionally inflict deliberate emotional distress, psychological trauma and psychic pain and suffering upon the Plaintiff and to instill in his mind an immediate and permanent sense of fear and trepidation and said conduct, acts or omissions surpass all bounds of decency universally recognized in a civilized society.
55. As a direct and proximate result and consequence of the aforesaid conduct, acts or omissions of the Defendants, which constitute extremely outrageous conduct, the Plaintiff has suffered, is suffering or will continue to suffer for an indefinite time into

the future the following:

- a. emotional and psychological distress and trauma;
- b. mental anguish;
- c. psychic pain and suffering;
- d. severe fright, horror and grief;
- e. shame, humiliation and embarrassment;
- f. severe anger, chagrin, disappointment and worry;
- g. the need to expend funds for medical care and treatment; and
- h. justified punitive damages, both factually and legally, because of the outlandish and outrageous conduct, actions and omissions of one of more of the Defendants.

WHEREFORE, Plaintiff, respectfully request that this Honorable Court award judgment against the Defendants, jointly and severally, nan amount in excess of the One Hundred Fifty Thousand (\$150,000.00) Dollars limit for adjudication in this jurisdiction.

COUNT III
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

PLAINTIFF JOSEPH P. MAHER

v.

ALL DEFENDANTS

56. Plaintiff hereby incorporates by reference all the allegations contained I paragraphs 1 though 55 above as though the same had ben set forth fully at length herein.

57. The aforesaid negligent conduct, acts or omissions of the Defendants in the scope of their employment or official duties or acting independently, including the acceptance, condoning, toleration or encouragement of such conduct, resulted in the negligent infliction of emotional distress, psychological trauma, and psychic pain and suffering upon the Plaintiff and id instill in his mind an immediate and permanent sense of fear and trepidation.
58. As a direct and proximate result and consequence of the aforesaid conduct, acts or omissions of the Defendants, which constitute extremely outrageous conduct, the Plaintiff has suffered, is suffering or will continue to suffer for an indefinite time into the future the following:
- a. emotional and psychological distress and trauma;
 - b. mental anguish;
 - c. psychic pain and suffering;
 - d. severe fright, horror and grief;
 - e. shame, humiliation and embarrassment;
 - f. severe anger, chagrin, disappointment and worry;
 - g. the need to expend funds for medical care and treatment; and
 - h. justified punitive damages, both factually and legally, because of the outlandish and outrageous conduct, actions and omissions of one of more of the Defendants.

WHEREFORE, Plaintiff, respectfully request that this Honorable Court award judgment against the Defendants, jointly and severally, nan amount in excess of the One Hundred Fifty Thousand (\$150,000.00) Dollars limit for adjudication in this jurisdiction.

COUNT IV
MALICIOUS PROSECUTION

PLAINTIFF JOSEPH P. MAHER

v.

ALL DEFENDANTS

59. Plaintiff hereby incorporates by reference all the allegations contained in paragraphs 1 through 58 above as though the same had been set forth fully at length herein
60. The actions, conduct and omissions of the Defendants, as described hereinbefore, constitute a malicious prosecution because the criminal prosecution was initiated and continued by the Defendants for their own malicious purpose and without probable cause. The prosecution of the Plaintiff was to hide the real motive behind the arrest and an attempt to intimate the Plaintiff into not pursuing his own future political activities.
61. Plaintiff believes and therefore avers, that the entire course of conduct of the Defendants was pursued for their own malicious purpose, which was other than to bring an accused person to justice, and was designed or calculated to punish the Plaintiff and impugn his character under the guise of enforcement of law.

62. As a direct and proximate result of the aforesaid actions and omissions of all Defendants in developing, implementing and carrying out the aforesaid plan, policy or continuing course of conduct, the Plaintiff has suffered the following injuries and losses and is entitled to the following damages:

- a. loss of the use, benefit and enjoyment of life and personal freedom of movement and association;
- b. physical and mental pain and suffering and anguish and embarrassment and humiliation;
- c. loss of valuable and inalienable rights to be free from malicious prosecution as well as free from loss of personal and familial privacy;
- d. loss of income and future earning capacity; to include injury to Plaintiff's business reputation, injure his reputation as an attorney all of which was directly has directly affected Plaintiff's ability to conduct business and earn income.
- e. loss of reputation both professionally and personally;
- f. punitive damages which are justified by the outlandish and outrageous conduct, actions and omissions of one or more of the Defendants as aforesaid.
- g. attorney's fees and costs to defend against the criminal action;
- h. the need to expend funds for medical care and treatment;

- i. emotional and psychological distress and trauma;
- j. psychic pain and suffering;
- k. severe fright, horror and grief;
- l. shame; and
- m. severe anger, chagrin, disappointment and worry.

WHEREFORE, Plaintiff, respectfully request that this Honorable Court award judgment against the Defendants, jointly and severally, nan amount in excess of the One Hundred Fifty Thousand (\$150,000.00) Dollars limit for adjudication in this jurisdiction.

COUNT V
ABUSE OF PROCESS

PLAINTIFF JOSEPH P. MAHER

v.

ALL DEFENDANTS

- 63. Plaintiff hereby incorporates by reference all the allegations contained in paragraphs 1 through 62 above as though the same had been set forth fully at length herein
- 64. The actions, conduct and omissions of the Defendants as described hereinbefore constitute an abuse of criminal process because of the malicious prosecution of the Plaintiff by the Defendants and their continuing course of tortious conduct fro July 19, 2005, until the exoneration of the Plaintiff, which was calculated and designed by the Defendants not for the lawful and legitimate purpose of bringing Plaintiff to justice,

but solely for their personal and malicious motives to utilize, prosecute and or inflict pain and punishment on the Plaintiff.

65. As a direct and proximate result of the aforesaid actions and omissions of all Defendants in developing, implementing and carrying out the aforesaid plan, policy or continuing course of conduct, the Plaintiff has suffered the following injuries and losses and is entitled to the following damages:

- a. loss of the use, benefit and enjoyment of life and personal freedom of movement and association;
- b. physical and mental pain and suffering and anguish and embarrassment and humiliation;
- c. loss of valuable and inalienable rights to be free from malicious prosecution as well as free from loss of personal and familial privacy;
- d. loss of income and future earning capacity; to include injury to Plaintiff's business reputation, injure his reputation as an attorney all of which was directly has directly affected Plaintiff's ability to conduct business and earn income.
- e. loss of reputation both professionally and personally;
- f. punitive damages which are justified by the outlandish and outrageous conduct, actions and omissions of one or more of the Defendants as aforesaid.

- g. attorney's fees and costs to defend against the criminal action;
- h. the need to expend funds for medical care and treatment;
- i. emotional and psychological distress and trauma;
- j. psychic pain and suffering;
- k. severe fright, horror and grief;
- l. shame; and
- m. severe anger, chagrin, disappointment and worry.

COUNT VI
FALSE ARREST

PLAINTIFF JOSEPH P. MAHER

v.

ALL DEFENDANTS

66. Plaintiff hereby incorporates by reference all the allegations contained in paragraphs 1 through 65 above as though the same had been set forth fully at length herein
67. The actions and conduct of the Defendants as described hereinbefore constitute a false arrest as the arrest of the Plaintiff on July 19, 2005 was accomplished without probable cause; according, there was not need to restrain Plaintiff Joseph P. Maher, to place Plaintiff Joseph P. Maher in handcuffs and transport him via police car to night court and to Lehigh County Prison or to continue to deprive him of his freedom as part of a full custodial arrest.

68. As a direct and proximate result of the aforesaid actions and omissions of all Defendants in developing, implementing and carrying out the aforesaid plan, policy or continuing course of conduct, the Plaintiff has suffered the following injuries and losses and is entitled to the following damages:

- a. loss of the use, benefit and enjoyment of life and personal freedom of movement and association;
- b. physical and mental pain and suffering and anguish and embarrassment and humiliation;
- c. loss of valuable and inalienable rights to be free from malicious prosecution as well as free from loss of personal and familial privacy;
- d. loss of income and future earning capacity; to include injury to Plaintiff's business reputation, injure his reputation as an attorney all of which was directly has directly affected Plaintiff's ability to conduct
- e. loss of reputation both professionally and personally;
- f. punitive damages which are justified by the outlandish and outrageous conduct, actions and omissions of one or more of the Defendants as aforesaid.
- g. attorney's fees and costs to defend against the criminal action;
- h. the need to expend funds for medical care and treatment;
- i. emotional and psychological distress and trauma;

- j. psychic pain and suffering;
- k. severe fright, horror and grief;
- l. shame; and
- m. severe anger, chagrin, disappointment and worry.

COUNT VII
LOSS OF CONSORTIUM

PLAINTIFF JULI' A. D'ANCONA-MAHER

v..

ALL DEFENDANTS

69. Plaintiff hereby incorporates by reference all the allegations contained in paragraphs 1 through 68 above as though the same had been set forth fully at length herein
70. The Plaintiffs are Husband and Wife and were married at the time and the date of the incidents as herein described.
71. Plaintiff Juli' A. D'Ancona-Maher was forced to stand by and witness the illegal arrest and detention by the Defendants of her husband and to endure the publication and republication of false information as to the incident of July 19, 2005 and the cause or causes of same, the outrageous and intentional and/or negligent nature of which caused her extreme emotional and psychic distress from which she continues to suffer.
72. As a direct and proximate result of the aforesaid actions and omissions of all Defendants in developing, implementing and carrying out the aforesaid plan, policy

or continuing course of conduct, the Plaintiff Juli' A. D'Ancona-Maher has suffered the following injuries and losses and is entitled to the following damages:

- a. Plaintiff Juli' A. D'Ancona-Maher has been deprived of the consortium, companionship and services of the Plaintiff Joseph P. Maher as a spouse;
- b. Plaintiff Juli' A. D'Ancona-Maher has been deprived of the use, benefit and enjoyment of life;
- c. Plaintiff Juli' A. D'Ancona-Maher has been deprived of her spouse's earnings and loss of future earning capacity; and
- d. Plaintiff Juli' A. D'Ancona-Maher has been required and will continue to in the future expend large sums of money for her spouse's medical care, treatment and supplies, medication and rehabilitation.

Respectfully submitted,



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Attorney for Plaintiffs

Date: July 19, 2007

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